

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

OSCAR ORONA IANF of N.O., *a minor*,
et. al.,

Plaintiffs

vs.

DANIEL DEFENSE, LLC, et. al.,

Defendants

Case No. 2:24-cv-00074-AM

**JOINT MOTION TO EXTEND
DEADLINES**

**JOINT MOTION FOR EXTENSION OF FILING
DEADLINES**

Plaintiffs respectfully submit this Joint Motion for Extension of Filing Deadlines in the above-captioned case. Specifically, the parties seek to propose a briefing schedule for all pending motions on the docket, as of the date of this filing. Plaintiffs have conferred with counsel for defendant Daniel Defense, who joins in this motion.

The parties propose the following briefing schedule:

MOTION TO DISMISS by Oasis Outback, LLC (ECF No. 7, filed August 1, 2024)	
Response by Plaintiffs	September 17, 2024 (see ECF No. 9 and 9.1; pending order from the Court)

Reply by Defendant	December 3, 2024 (see ECF No. 9 and 9.1; pending order from the Court)
--------------------	---

MOTION FOR REMAND by Plaintiffs to be filed by August 12, 2024	
Response by Defendant	September 9, 2024
Reply by Plaintiffs	October 7, 2024

MOTION TO DISMISS by Daniel Defense, LLC to be filed by August 30, 2024	
Response by Plaintiffs	October 31, 2024
Reply by Defendant	January 17, 2025

The Court has “broad discretion” to extend these deadlines pursuant to Federal Rule of Civil Procedure 6(b). *See, e.g., Lorenz v. Wal-Mart Stores, Inc.*, No. SA 05 CA 0319 OG(NN), 2006 WL 581215, at *1 (W.D. Tex. Mar. 7, 2006) (“district courts have broad discretion to manage their dockets. Likewise, it is well-settled that district courts have broad discretion under Federal Rule of Civil Procedure 6(b) to expand filing deadlines.”) (footnote omitted); *U.S. ex rel. Long v. GSDMidea City, L.L.C.*, 798 F.3d 265, 275-76 (5th Cir. 2015) (“district courts have broad discretion under Rule 6(b) to expand filing deadlines”); *see also Cable/Home Commc’n Corp. v. Network*

Prods., Inc., 902 F.2d 829, 859 (11th Cir. 1990) (discussing discretion afforded to district courts when ruling on requests for enlargements of time).

The parties have good cause for this request, and it is not intended to delay. As is evident from the docket, there are multiple substantive motions pending between the parties, each with significant substantive arguments. Additionally, the proposed schedule envisions that the Motion for Remand will be the first of those motions to be fully briefed. The proposed schedule promotes judicial economy and efficiency by allowing the parties to address remand and the Court's subject matter jurisdiction before addressing the motion to dismiss. The requested extensions allow the parties the necessary time to brief the complex issues raised by each of the motions.

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion and adopt the above briefing schedule. Counsel for the defendant Daniel Defense and Oasis Outback have no objection to this request.

CERTIFICATE OF CONFERENCE

The undersigned met and conferred with counsel of record for Defendant Daniel Defense. Counsel for Daniel Defense joins in these requested extensions.

Respectfully Submitted,

/s/ Jamal Alsaffar

JAMAL ALSAFFAR

jalsaffar@nationaltriallaw.com

Texas State Bar #24027193

TOM JACOB

tjacob@nationaltriallaw.com

Texas State Bar #24069981
LAURIE HIGGINBOTHAM
lhigginbotham@nationaltriallaw.com
Texas State Bar #50511759
STEVEN HASPEL
shaspel@nationaltriallaw.com
Texas State Bar #24109983
NATIONAL TRIAL LAW
1114 Lost Creek Blvd, Ste. 410
Austin, TX 78746
(512) 476-4346 (o)
(512) 467-4400 (f)

Attorneys for all Plaintiffs